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**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**BARBER-COLMAN COMPANY
ROCKFORD, ILLINOIS**

ILD 005 145 958

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

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- B - VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS
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EXECUTIVE SUMMARY

Resource Applications, Inc. (RAI) performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Barber-Colman Company, Colman Metal Finishing (Barber-Colman) facility in Rockford, Illinois. This report summarizes the results of the PA/VSI and evaluates the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of RCRA facilities for corrective action.

The Barber-Colman facility performs a variety of metal finishing procedures, including plating, heat treating, and deburring and blasting (rotofinishing). Barber-Colman has been operating at its current facilities since 1905. In 1984, Reed Chatwood, Inc. purchased the facility and some of Barber-Colman's equipment. Barber-Colman, located at 1300 Rock Street, now leases and occupies parts of four buildings of a 20-acre industrial complex owned by Reed Chatwood, Inc. Barber-Colman currently operates as a generator under RCRA, although in the past, the facility was regulated as a Treatment, Storage, and Disposal facility. Prior to its change to generator status, the facility closed 4 hazardous waste storage areas. Hazardous wastes are currently generated by plating operations and are stored in 55-gallon drums and a 20-cubic yard dumpster.

The PA/VSI identified the following 10 SWMUs and no AOCs at the facility:

Solid Waste Management Units

1. Butler Building Storage Area
2. Cold Storage Area
3. Carpenter's Shed Storage Area
4. Outside Earthen Storage Area
5. Wastewater Treatment Unit
6. Plating Cake Dumpster
7. Waste Storage Area
8. Battery Storage Area
9. Paint Waste Storage Area
10. Satellite Accumulation Areas

The potential for a release to the ground water, surface water, air or soil from this facility is low. Most of the SWMUs that currently handle hazardous wastes are inside buildings, have secondary containment, and/or are used to handle wastes in relatively small quantities. The exceptions are the Battery Storage Area (SWMU 8) and the Paint Waste Storage Area (SWMU 9). Although wastes have not been stored at the Battery Storage Area (SWMU 9) since 1987, the past potential for a release to soil was high. Batteries were stored directly on top of the soil, so any release would have entered the soil. Because the terrain in the area slopes toward the Rock River, located immediately east of the facility, there was a moderate potential that a release could have entered the river via runoff. Rockford receives its ground water from a shallow sandstone aquifer, therefore if the soil was contaminated in the past, the past potential for release and current potential for ongoing release to the ground water was and is moderate. If the soil was not contaminated, then the past potential and current potential for release was and is low. The facility has not used the Paint Waste Storage Area (SWMU 9) since 1984. During the time the unit was operating, the integrity of the asphalt and the integrity and capacity of containers that stored the wastes were unknown. Past potential release to soil, ground water, surface water, and air was probably low. If the soil is contaminated, then current potential for an ongoing release to ground water is moderate. If the soil is not contaminated, then the current release potential to ground water is low.

Surface waters in the vicinity of the plant are a potential receptor of hazardous materials. Filter cake from the treatment of plating wastes is stored in a dumpster immediately adjacent to the Rock River. A plastic tarp covers the dumpster, so release potential is low.

Barber-Colman is located in a light industrial area on the west bank of the Rock River. Public access to the facility is controlled by locked entrance doors.

The city of Rockford receives its water supply from a shallow sandstone aquifer located at a depth of 100 feet and extending to 300 feet. The nearest municipal well is located 0.8 mile southwest of the facility (downgradient). The nearest residences are approximately a quarter-mile to the west of the facility. Apart from the Rock River, which is immediately to the east of the facility, there are no sensitive environments located within two miles of the facility.

Two separate releases have occurred at the facility, both involving commercial product acids. In 1984, 350 gallons of sulfuric acid leaked out of a pipe connected to a product tank. During remediation, 100 55-gallon drums of soil were removed from the site. Subsequent soil sampling showed no contamination. In 1989, 260 gallons of hydrochloric acid were released from a product tank and

breached the secondary containment berm. Powdered lime was applied to the soil to neutralize the release. Soil samples taken 6 and 8 months after the release showed that no contamination exists.

Soil sampling should be conducted at the Battery Storage Area (SWMU 8) and the Paint Waste Storage Area (SWMU 9) to determine the presence of contaminants.

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1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC) received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5. Resource Applications, Inc. (RAI), TES 9 Team member, provided the necessary assistance to complete the PA/VSI activities for Barber-Colman Company, Colman Metal Finishing (Barber-Colman).

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all SWMUs, identifying evidence of releases, initially identifying potential sampling locations, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Barber-Colman facility in Rockford, Illinois. The PA was completed on April 22, 1991. RAI gathered and reviewed information from the Illinois Environmental Protection Agency (IEPA) and from EPA Region 5 RCRA files. RAI also reviewed documents from the U.S. Department of Agriculture (USDA), U.S. Geological Survey (USGS), Federal Emergency Management Agency (FEMA), and the Illinois State Geological Survey (ISGS). The VSI was conducted on April 23, 1991. It included interviews with Barber-Colman facility representatives and a walk-through inspection of the facility. Ten SWMUs and no AOCs were identified at the facility.

RAI completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and 14 inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, release history, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

Barber-Colman is located at 1300 Rock Street, Rockford, Illinois (Figure 1). The facility is situated in a light industrial area at latitude 42° 15' 32" N, longitude 89° 05' 53" W (Barber-Colman, 1980b.) The property covers 20 acres, of which 40,000 square feet is utilized by Barber-Colman. Industrial facilities border the facility to the north, south and west; the Rock River is immediately to the east.

2.2 FACILITY OPERATIONS

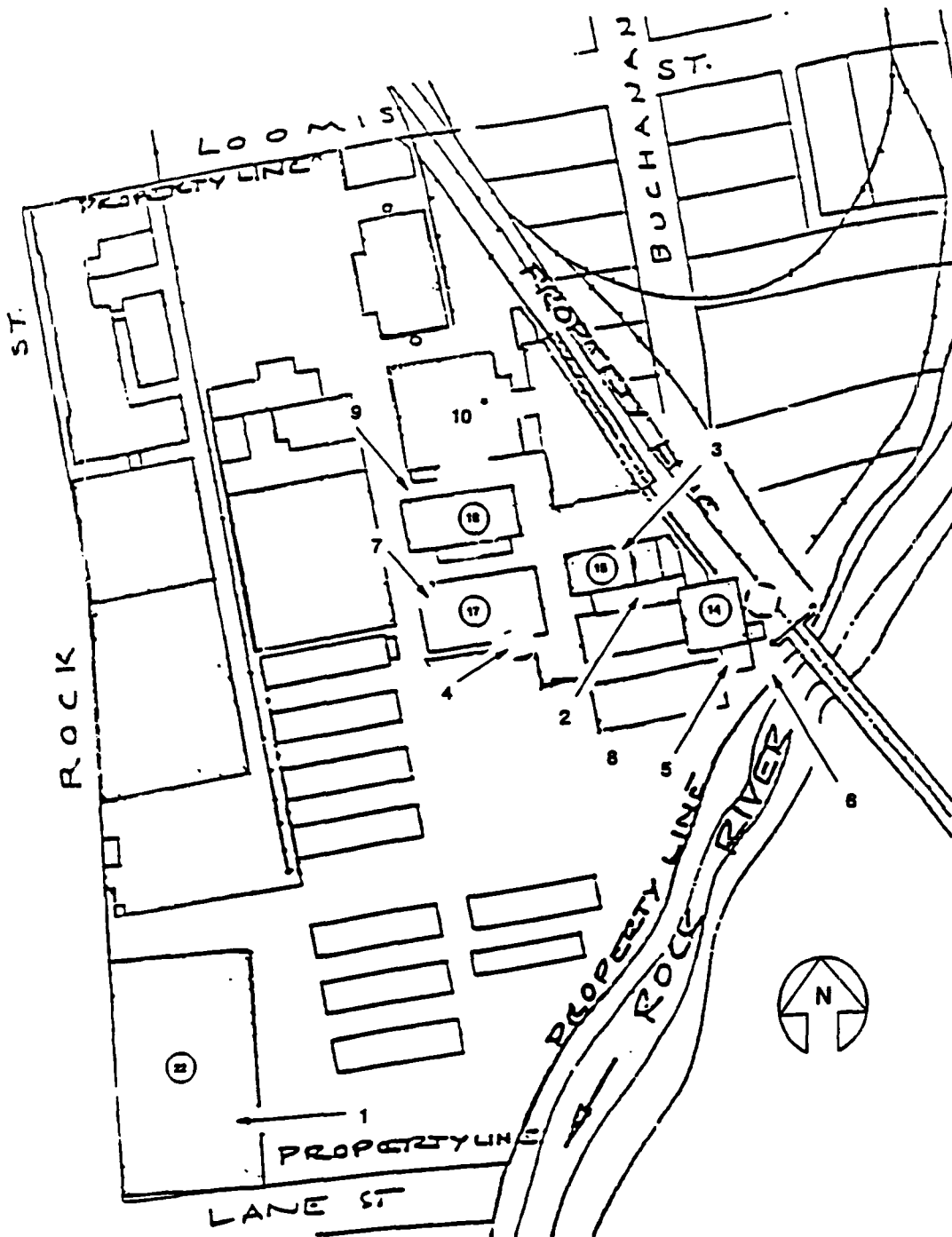
Barber-Colman began operations in 1905. The facility steadily grew, making additions during the 1930's and 1940's. In 1984, Reed Chatwood, Inc. (Reed Chatwood), a textile machinery manufacturing company, purchased the property, along with Barber-Colman's textile division equipment. Barber-Colman began leasing the 40,000 square feet that it now occupies from Reed-Chatwood. Currently, Barber-Colman employs 45 individuals, working in one shift.

Barber-Colman manufactures electroplated fasteners for the automotive, agricultural, and construction industries. The facility conducts 3 separate processes, depending on the specifications of the customer. Processes include rotofinishing, heat treating, and plating. These processes can be conducted separately or in conjunction with each other, depending on customer specifications. Rotofinishing involves the tumbling of products with stones and water to remove rough edges and large scale build up. Water effluent containing metals is discharged to the sanitary sewer system, and is monitored by both the facility and the Rockford Sanitary District; this is the only waste from the rotofinishing process. Heat treating is conducted to achieve particular mechanical strengths within the products. The atmospheric furnace process involves burning of gases to heat the metals. No waste is produced by this process. Cyanide salts are used for another heat treating process. Waste cyanide salts (F007) are drummed and disposed of by Cyanokem of Detroit, Michigan. Barber-Colman conducts 6 separate plating operations that include; zinc, nickel, chrome, copper, aluminum, and black zinc oxide. Prior to plating, the products are placed in a series of caustic and acid cleaning tanks (pickling) to

TABLE 1
SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Butler Building Storage Area	Yes	Closed in 1988.
2	Cold Storage Area	Yes	Closed in 1988.
3	Carpenter's Shed Storage Area	Yes	Closed in 1988.
4	Outside Earthen Storage Area	Yes	Closed in 1988.
5	Wastewater Treatment Unit	No	Active.
6	Plating Cake Dumpster	No	Active, less than 90-day storage.
7	Waste Storage Area	No	Active, less than 90-day storage.
8	Battery Storage Area	No	Inactive since 1987.
9	Paint Waste Storage Area	No	Inactive since 1984.
10	Satellite Accumulation Areas	No	Active, less than 90-day storage.


* A RCRA hazardous waste management unit is one that currently requires or formerly required a RCRA Part A or Part B Permit.



Solid Waste Management Units

1. Butler Building Storage Area
2. Cold Storage Area
3. Carpenter's Shed Storage Area
4. Outside Earthen Storage Area
5. Wastewater Treatment Unit
6. Plating Cake Dumpster
7. Waste Storage Area
8. Battery Storage Area
9. Paint Waste Storage Area
10. Satellite Accumulation Areas

* SWMU 10 is satellite areas
located in Buildings 14 and 16.

Barber-Colman Company Rockford, Illinois	
Figure 2 FACILITY LAYOUT/SWMU LOCATIONS	
Scale: 1" = 200'	
Source: Barber-Colman Company, 1980b	
	Resource Applications, Inc.

remove scale build up. After pickling, the products can then be plated. SWMUs at the Barber-Colman facility are listed in Table 1 and Figure 2 shows their location in the facility.

Since 1984, wastes generated from the plating processes have been treated in the Wastewater Treatment Unit (SWMU 5). After treatment, wastewater is discharged into the sanitary sewer system, while the sludge is pumped to a filter press (part of SWMU 5). Filter cake from the press is stored in the Plating Cake Dumpster (SWMU 6). Prior to 1984, plating wastes were treated in a Batch Treatment Unit, located in the same area. Wastewater from the Batch Treatment Unit was discharged into the sanitary sewer system, while the sludge was stored in 55-gallon drums located in the Butler Building Storage Area (SWMU 1), the Cold Storage Area (SWMU 2), the Carpenter's Shed Storage Area (SWMU 3), and the Outside Earthen Storage Area (SWMU 4). Since 1987, spent 1,1,1-trichloroethane (TCA), spent cyanide salts, and spent quenching oil have been stored in Satellite Accumulation Areas (SWMU 10) before transfer to the Waste Storage Area (SWMU 7). Before 1987, the spent TCA, spent cyanide salts, and spent quenching oil were stored in SWMUs 1, 2, and 3.

Past processes at Barber-Colman included automotive repair work and general maintenance painting operations. Used batteries were managed in the Battery Storage Area (SWMU 8) and painting wastes were stored in the Paint Waste Storage Area (SWMU 9). The dates over which these processes occurred are not known. The facility representatives were unable to provide any information on manufacturing operations and waste streams generated prior to 1980.

2.3 WASTE GENERATING PROCESSES

Wastes are primarily generated during the heat treating and plating operations (Table 2). Before heat treating begins, the fasteners are cleaned in a vapor degreaser with TCA (F001). The spent TCA, generated at an annual rate of 14 55-gallon drums, is stored in the Waste Storage Area (SWMU 7) prior to disposal by Avganic Industries, Cottage Grove, WI.

Wastes from the 6 different plating lines are pumped into the Wastewater Treatment Unit (SWMU 5) before discharge into the sanitary sewer system. The Wastewater Treatment Unit consists of two separate processes, a Batch Treatment System (BTS) and a Continuous Treatment System (CTS). In the BTS, the treatment takes place in a single tank. After treatment, the wastewater is discharged to the sewer system and the sludge is pumped to a filter press (part of SWMU 5). In the CTS, the process is the same except the treatment takes place in a series of tanks. Filter cake generated from the filter press is stored in the 20-cubic yard Plating Cake Dumpster (SWMU 6) and picked up by Enviroite,

TABLE 2
SOLID WASTES

<u>Waste/EPA Waste Code</u>	<u>Source</u>	<u>Primary Management Unit</u>
Spent TCA/F001	Heat Treating Process	SWMUs 1, 7, & 10
Plating Cake/F006	Plating Process	SWMUs 3, 4, & 6
Plating Wastewater	Plating Process	SWMU 5
Spent Quench Oil	Heat Treating Process	SWMUs 1, 2, 3, 7, & 10
Painting Wastes	Painting Process	SWMU 9
Automobile Batteries	Automotive Repair Shop	SWMU 8
Cyanide Salts/F007	Heat Treating Process	SWMUs 7 & 10
Nickel and zinc filters/ non-hazardous	Plating lines (no longer generated)	SWMUs 1, 2 & 3
Chromic acid/D007	Plating lines	Formerly SWMUs 1, 2 & 3; now SWMU 5

Inc., Harvey, Illinois at a rate of 1 dumpster per month. Prior to 1987, waste chromic acid (D007), nickel filters and zinc filters were stored in the Butler Building Storage Area (SWMU 1), the Cold Shed Storage Area (SWMU 2), and the Carpenter's Shed Storage Area (SWMU 3). Facility representatives verbally stated that the nickel and zinc filters were non-hazardous. Chromic acid is no longer drummed for off-site disposal, as the Waste Water Treatment Unit (SWMU 5) has a chrome reduction process, enabling Barber-Colman to treat the waste on-site. In addition, the nickel and zinc filter systems have been replaced by the filter press in the Wastewater Treatment Unit (SWMU 5).

In order to maintain the properties created during the Heat Treating Process, the products must be rapidly cooled. Once the products are removed from the oven, they are placed in a container of quenching oil. Spent quench oil is pumped from the quench tank into 55-gallon drums located in Satellite Accumulation Areas (SWMU 10). The drums are then transferred to the Waste Storage Area (SWMU 7). The waste oil is then shipped to SET Environmental Treatment, Inc., Houston, Texas at a rate of 5 drums every 3 months. There has been no documented event in which quenching oil has come in contact with hazardous wastes. Cyanide salts are also used in the heat treating process. Waste cyanide salts are removed with a ladle and transported to a 55-gallon drum (one of the Satellite Accumulation Areas - SWMU 10) before transfer to SWMU 7. The waste cyanide salts are picked up by Cyanokem, Detroit, Michigan at a rate of 3 drums per year.

From approximately 1970 to 1987, Barber-Colman repaired facility automobiles. Used batteries were stored outside in the Battery Storage Area (SWMU 8). According to facility representatives, the batteries were generated at a rate of approximately 50 per year and were sent to various scrap companies located in Rockford including Erickson Salvage and Rush Batteries, Inc.

From an unknown period of time to 1984, Barber-Colman conducted general maintenance painting operations. The empty containers were managed in the Paint Waste Storage Area (SWMU 9). Facility representatives could not explain how the containers were removed from the property.

2.4 RELEASE HISTORY

On October 9, 1984, a release of 375 gallons of commercial product sulfuric acid occurred. Vandals had ruptured a pipe from a storage tank releasing the commercial sulfuric acid. Powdered lime and calcium carbonate were rototilled into the contaminated soil. One hundred 55-gallon drums of soil were removed, 70 drums were landfilled and 30 drums, with a pH below 2, were shipped for treatment and disposal.

On February 6, 1989 approximately 260 gallons of commercial product hydrochloric acid was released from a storage tank and breached the secondary containment. A lime dike was constructed around the secondary containment berm to control the spill. The acid that remained inside the secondary containment berm was pumped into barrels and transported to the Wastewater Treatment Unit for treatment. Soil samples taken on February 13, 1989, revealed pH levels at 11.94, indicating a high concentration of lime in the soil. Subsequent soil samples taken on July 5, 1989 and September 19, 1989 showed pH levels of 6.93 and 6.66 respectively.

No other releases have been documented at the facility.

2.5 REGULATORY HISTORY

Barber-Colman filed a Notification of Hazardous Waste Activity on August 13, 1980 designating the company as a generator and treatment, storage, and disposal (TSD) facility (Barber-Colman, 1980a). On their Part A Permit, filed on November 17, 1980, the facility stated that 13,000 pounds of F007 wastes were stored in containers (S01) annually (Barber-Colman, 1980b). Barber-Colman re-submitted their Notification of Hazardous Waste Activity on January 7, 1987 and subsequently re-submitted their Part A Permit on the same date (Barber-Colman, 1987a,b). The new Part A stated that 1 ton each of D003, D006, and D007 wastes; 2 tons each of F007 and F008 wastes; 3 tons of F001 waste; and 4 tons of D001 wastes are stored (S01) annually. The treatment (T01) process was not included on the amended Part A application because it represented a wastewater treatment unit which is not regulated under RCRA. The change of facility ownership was not mentioned in the Part A application. Facility representatives could not explain the discrepancies between the wastes listed on the Part A Permit and actual wastes managed at the facility. Barber-Colman filed a Closure Plan on September 25, 1987 to close 4 separate S01 container storage areas (SWMUs 1 through 4). Their Part A Permit was withdrawn May 5, 1988, when it was determined by IEPA that the Closure of the S01 container storage areas satisfied RCRA requirements (IEPA, 1988a). Barber-Colman is now regulated by IEPA as a generator only.

A January 5, 1983 IEPA inspection revealed the following violations of 35 Illinois Administrative Code. The company did not have inspection records, training records, a contingency plan, or a closure plan (IEPA, 1983). A May 22, 1985 IEPA inspection showed Barber-Colman did not have a waste analysis plan, inspection records, training records, contingency plan, closure plan, weekly inspection reports, incompatible wastes were stored together, and no placards were available for the transporter (IEPA, 1985). These are all violations of 35 Illinois Administrative Code. On November

11, 1986 IEPA again inspected the facility and found the following violations of 35 Illinois Administrative Code. The facility failed to list caustic sludge on their Part A; failed to have a waste analysis plan; failed to place "Danger - Unauthorized Personnel Keep Out" at storage area; and a storage area did not have an internal alarm (IEPA, 1986). Additional violations of 35 Illinois Administrative Code were observed during a January 29, 1988 IEPA inspection. Barber-Colman failed to have a written evacuation plan and a list of emergency equipment (IEPA, 1988a). RAI could not locate any information stating if any of the above mentioned violations had been resolved.

Barber-Colman currently has an Operating Permit to operate emission sources and/or air pollution control equipment for their production processes. This permit expires May 30, 1996 (IEPA, 1991). The facility does not have scrubber or baghouse units. Barber-Colman previously had a NPDES permit; but, since 1984, the facility has no longer discharged to the Rock River, so a NPDES permit is not required. No violations of the above mentioned permits have been identified.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the Barber-Colman facility.

2.6.1 Climate

The site is situated in Rockford, Illinois in Winnebago County. Rockford is the location of the nearest U.S. National Weather Service office. With no significant topographical barriers to the airmass flow, the climate in the area is typically continental with cold winters; warm summers; and frequent short periodic fluctuations in the temperature, humidity, cloudiness, and wind direction (Ruffner and Bair, 1985). The average daily temperature is 47.8°F. The lowest average daily minimum temperature is 9.8°F in January. The highest average daily maximum temperature is 91.9°F in August. The prevailing wind direction is west-southwest and the average wind speed is 9.9 miles per hour. Average annual net precipitation is 5.44 inches. In winter, about one half of the precipitation, or 10 per cent of the annual total, falls as snow. During the fall, winter, and spring, the pattern of precipitation tends to be more uniform over both time and distance, whereas in summer rainfall is often locally heavy and variable. The one year, 24-hour maximum rainfall recorded in the area over the last 25 years is 5.56 inches (Ruffner, 1985).

2.6.2 Flood Plain and Surface Water

The general direction of surface flow is toward the Rock River which lies immediately east of the facility and flows from north to south. The terrain has a slope of about 40 feet over a distance of 0.8 mile, providing effective relief for surface runoff. The site locale is classified as a Zone A flood plain, that is, an area with a greater than one percent probability of flooding in any given year (FEMA, 1982).

2.6.3 Geology and Soils

Winnebago County is characterized by broad, rolling glaciated uplands that rise 100 to 200 feet above the valleys. The bedrock along the Rock River in the Rockford area lies buried beneath glacial deposits that are up to 300 feet thick (Anderson, 1967). These glacial deposits consist of sorted sand and gravel, with some finer material, and are known as valley train deposits (Berg et al., 1984; Hackett and Bergstrom, 1956). The facility is surrounded by buildings, parking lots and pavement which prevent complete identification of the geological features. The area's drainage characteristics are well graded so that surface water drains to edges of lots and finally into the storm water drainage system. As a result of construction, the water carrying capacity and permeability of the soil varies and is generally considered low to moderate. Runoff is considered moderate to high because of the steep slopes and the proximity of the Rock River.

The sand and gravel deposits in the Rock River Valley near the site are approximately 150 feet thick. The bedrock units underlying the glacial drift are marine sandstones, shales and dolomites, with an approximate total thickness of 2,000 feet. These rocks were deposited in the interval 520 to 400 million years ago, during the Cambrian, Ordovician and Silurian periods of the Paleozoic Era. The uppermost bedrock units in the vicinity of the site are dolomites of the Galena-Platteville Formation, and these are underlain by the Glenwood-St. Peter sandstones.

2.6.4 Ground Water

In northern Illinois ground water resources are available from four major aquifers, including: (1) sand and gravel aquifers in the glacial drift; (2) the dolomite aquifers, consisting of the Galena and Platteville Dolomite groups; (3) sandstone aquifers consisting of the Glenwood-St. Peter and Ironton-Galesville Sandstones; and, (4) the deeper Mt. Simon aquifers, consisting of the Mt. Simon Sandstones

of the Eau Claire Formation (Berg et al., 1984). In the site vicinity, excellent sand and gravel aquifers occur. Municipal and industrial supplies are obtained from up to 150 feet of coarse sand and gravel (Hackett and Bergstrom, 1956).

The Galena-Platteville Dolomite group constitutes the uppermost bedrock in Winnebago County, and is probably the most widely used bedrock aquifer for domestic supplies, although the deeper sandstones are the most dependable source for large quantities of ground water. Because of their widespread distribution, consistent water yielding zones and shallow position, the dolomites provide water to most of the wells through joints and fractures close to the land surface. The average thickness of drift over the dolomite is 30 feet and the average depth of wells is 104 feet. Reported well yields range from 5 to 40 gallons per minute (gpm) with an average yield of 20 gpm. Penetration into dolomite from about 20 to 100 feet yields satisfactory water supplies. Where the drift cover is relatively thin, dolomite aquifers are very sensitive to contamination because water moves through the joints and fractures and there is little opportunity for filtration through granular materials (Berg, et al., 1984). In close proximity to the Rock River, the drift deposits are underlain directly by the St. Peter sandstones, due to removal of the dolomites by erosion.

The St. Peter, Ironton-Galesville and the Elmhurst-Mt. Simon Sandstones furnish large quantities of water. Deeper aquifers are used only for larger municipal and industrial water supplies. The St. Peter Sandstone, the shallowest of the three aquifers, is used for domestic ground water supplies and is present at a depth of approximately 150 feet below the land surface near the site (Berg, et al., 1984). The general flow of ground water is from west to east towards the Rock River.

2.7 RECEPTORS

Barber-Colman is located in a light industrial area in Rockford, Illinois. Industry borders the facility to the north, south, and west while the Rock River is located immediately east of the facility. The nearest residences are approximately a quarter-mile to the west of the facility. The population of Rockford is 142,000. Public access to the facility is prevented by fences and locked doors. Individuals have to pass facility personnel to gain admittance to the facility.

The terrain in the vicinity of the site slopes toward the Rock River, located immediately east of the facility. The Rock River is primarily used for recreation. The facility and the community receive their water supply from shallow ground water wells located at a depth of 100 feet. However, the nearest well which is 0.8 mile southwest of the facility (downgradient), is 1,219 feet deep, into St. Peter

sandstone. Other than the Rock River, no other sensitive environments are located within two miles of the facility.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the 10 SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of release, and RAI observations.

SWMU 1 Butler Building Storage Area

Unit Description: This unit is located inside in the southwest corner of the property in Building 22 (Figure 2). It consist of a 21-foot x 31-foot area with a 2-to 3-inch thick asphalt floor. It was used as the final storage area for wastes generated at Barber-Colman (photo 1).

Date of Startup: 1980.

Date of Closure: This unit was closed in accordance with an IEPA-approved closure plan in 1988 (IEPA, 1988a).

Wastes Managed: Cyanide salts (F007), chromic acid (D007), TCA (F001), plating cake (F006), nickel filters (non-hazardous), and zinc filters (non-hazardous).

Release Controls: The unit is located inside a building. There is 2-to 3-inch thick asphalt flooring and a 3-to 4-inch high asphalt containment berm located outside the east doors of the building. After closure, washwater samples for heavy metals were taken from the unit floor and results were below the cleanup levels specified in the approved closure plan.

History of Release: No releases have been documented at this unit.

Observations: This unit has been closed since 1988. No wastes were observed at this unit. The asphalt floor had no cracks and appeared visually sound.

SWMU 2 Cold Storage Area

Unit Description: This 28-foot x 112-foot unit, south of Building 15 (Figure 2), has containment walls to the north, south, and east, while a 10-foot wide opening exists to the west. The floor is level and constructed of concrete. All wastes were stored in separate containers (photo 2).

Date of Startup: 1980.

Date of Closure: This unit was closed in accordance with an IEPA-approved closure plan in 1988 (IEPA, 1988a).

Wastes Managed: Cyanide salts (F007), chromic acid (D007), plating cake (F006), nickel filters (non-hazardous), and zinc filters (non-hazardous).

Release Controls: During operation the unit was bounded on 3 sides by a retaining wall. A 10-foot wide opening to the west would allow a large spill to enter the asphalt parking lot. Asphalt curbs in the parking lot would contain the release. After closure, washwater samples for heavy metals were taken from the unit floor and results were below the cleanup levels specified in the approved closure plan.

History of Release: No releases have been documented from this unit.

Observations: This unit was closed in 1988 and has since been converted to office space.

SWMU 3 Carpenter's Shed Storage Area

Unit Description: This 2,358-square foot unit is located in Building 15 (Figure 2). The area is enclosed on all 4 sides with 10-foot high overdoors located in the middle of the east and west walls (photo 3).

Date of Startup: 1980.

Date of Closure: This unit was closed in accordance with an IEPA-approved closure plan in 1988 (IEPA, 1988a).

Wastes Managed: Cyanide salts (F007), plating cake (F006), nickel filters (non-hazardous), and zinc filters (non-hazardous).

Release Controls: The unit is inside with sound concrete flooring. If a large release were to leave the building, it would be contained in the same parking lot as SWMU 2. After closure, washwater samples for heavy metals were taken from the unit floor and results were below the cleanup levels specified in the approved closure plan.

History of Release: No releases have been documented at this unit.

Observations: This unit has been closed since 1988. No wastes were observed at this unit. The concrete floor appeared visually sound.

SWMU 4 Outside Earthen Storage Area

Unit Description: This 10-foot x 30 foot area is located outside and southeast of Building 17 (Figure 2). The flooring consists of a crushed sand and gravel mixture (photo 4).

Date of Startup: 1980.

Date of Closure: This unit was closed in accordance with an IEPA-approved closure plan in 1988 (IEPA, 1988a).

Wastes Managed: Plating cake (F006).

Release Controls: The plating cake was stored in 55-gallon drums and the drums were placed directly on top of the soil. There was no secondary containment. After closure, soil samples for heavy metals were taken in the center of the unit and results were below the cleanup levels specified in the approved closure plan.

History of Release: No release were documented at this unit.

Observations: This unit was used on 1 occasion to store 3 drums of waste. There were no wastes observed at the unit and no visual evidence of a release was observed.

SWMU 5**Wastewater Treatment Unit**

Unit Description: This unit is located inside of Building 14 (Figure 2) and consists of 3 treatment units: a 2,000-gallon Batch Treatment System, a Continuous Treatment System, and a filter press. Treated wastes from the batch tank are pumped back into the plating lines when needed. The continuous treatment system is made up of a 700-gallon chromium conversion tank used to convert hexavalent chrome to trivalent chrome; a 700-gallon flocculation tank; a 3,000-gallon clarifying tank; and a 1,000-gallon sludge settling tank. Treated wastes are discharged to the sewer system, while the sludge is pumped to the filter press. Filter cake generated from the press is stored in the Plating Cake Dumpster (SWMU 6) and wastewater is pumped back into the treatment unit (photos 5 and 6). The tanks are constructed of polypropylene; the filter press is steel.

Date of Startup: 1984.

Date of Closure: This unit is currently active.

Wastes Managed: Wastewaters generated from the plating operations.

Release Controls: The unit is located inside. Any release would be contained inside the building.

History of Release: No releases have been documented at this unit.

Observations: The unit appears visually sound and no releases were observed during the VSI.

SWMU 6**Plating Cake Dumpster**

Unit Description: This 20-cubic yard steel dumpster is located outside SWMU 5, separated by a wire fence along the bank of the Rock River. A plastic tarp covers the top of the unlined dumpster (photo 7). It is used for less than 90-day storage of hazardous wastes.

Date of Startup: 1987.

Date of Closure: This unit is currently active.

Wastes Managed: Plating Cake (F006).

Release Controls: The dumpster is constructed of steel and has a plastic tarp covering.

History of Release: No release has been documented at this unit.

Observations: During the VSI, RAI noticed that the plastic tarp was not over the entire top of the dumpster. The unit was clearly marked as containing hazardous wastes.

SWMU 7 Waste Storage Area

Unit Description: This storage unit is located in Building 17 (Figure 2) and consists of a 20-foot x 30-foot area on a concrete flooring (photo 8). It is used to store 55-gallon drums of wastes for less than 90 days.

Date of Startup: 1987.

Date of Closure: This unit is currently active.

Wastes Managed: TCA (F001), cyanide salts (F007), and spent quench oil (non-hazardous).

Release Controls: The unit is located inside underlain by a concrete floor. Drums are stored on wooden pallets.

History of Release: No releases have been documented at this unit.

Observations: During the VSI, no drums of TCA or cyanide salts were observed. The drums containing spent quench oil appear in sound condition and no evidence of a release was observed.

SWMU 8 Battery Storage Area

Unit Description: This area, located outside and south of Building 20 (Figure 2), was used to store used automobile batteries (photo 9).

Date of Startup: 1970.

Date of Closure: The unit has not been used to store wastes since 1987. It has not undergone formal RCRA closure.

Wastes Managed: Automobile batteries.

Release Controls: Batteries were stored on the open ground with no barriers between the soil and the batteries.

History of Release: No releases have been documented at this unit. However, no soil samples have been taken to determine the presence of lead or corrosive contaminants.

Observations: No visual evidence of a release was observed.

SWMU 9 Paint Waste Storage Area

Unit Description: This 10-foot x 10-foot area is located outside between Buildings 12 and 16 (Figure 2) and was used to store paint wastes from general maintenance painting (Photo 10). It is not known whether wastes were stored in this area for periods of greater than 90 days.

Date of Startup: Unknown.

Date of Closure: Barber-Colman has not conducted painting operations since 1984. Reed-Chatwood currently uses this area for storage of wooden refuse. The unit has not undergone formal RCRA closure. No painting activities currently occur at the facility.

Wastes Managed: Paint wastes (exact constituents unknown).

Release Controls: Wastes were stored outside on an asphalt parking lot. There was no secondary containment around the unit.

History of Release: No release has been documented at this unit.

Observations: During the VSI, no paint wastes were observed. The area is now used to hold general refuse.

SWMU 10 Satellite Accumulation Areas

Unit Description: These units consist of a 55-gallon drum of spent TCA, a 5-gallon bucket of spent quench oil, a 55-gallon drum of spent quench oil, and a 55-gallon drum of cyanide salts. Waste TCA from the vapor degreaser drains into the 55-gallon drum. The spent quench oil is skimmed off the top of the quenching tank and drips into the 5-gallon bucket. When the bucket is full, the wastes are transferred to the 55-gallon drum. Spent cyanide salt is dipped out of its tank with a ladle and the wastes are then poured into a 55-gallon drum. When all of the above mentioned 55-gallon drums are full, they are transferred to the Waste Storage Area (SWMU 7) (photos 11, 12, 13, and 14) to be stored for less than 90 days prior to hauling.

Date of Startup: 1980.

Date of Closure: These units are currently active.

Wastes Managed: TCA (F001), cyanide salts (F007), and spent quench oil (non-hazardous).

Release Controls: All of the containers are placed on a concrete floor and the TCA drum has a drip pan beneath it to contain any TCA that drips from the drum.

History of Release: No releases have been documented from this unit. Cyanide salts were observed by RAI personnel on the floor around the cyanide drum.

Observations: The containers appear old and are rusted in spots. Cyanide salts were observed on the floor around the drum during the VSI.

4.0 AREAS OF CONCERN

RAI identified no AOCs during the PA/VSI.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified 10 SWMUs and no AOCs at the Barber-Colman facility. Background information on the facility's location, operations, waste generating processes, release history, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, release history, and observed condition, is discussed in Section 3.0. AOCs are discussed in Section 4.0. Following are RAI's conclusions and recommendations for each SWMU. Table 3 identifies the SWMUs at the Barber-Colman facility and suggested further actions.

SWMU 1 Butler Building Storage Area

Conclusions: The storage area was located inside, and has a 2-to 3-inch thick asphalt floor. A 3-to 4-inch high asphalt containment curb is located outside the entrance doors, the only escape route for a release. This unit operated from 1980 until 1988. If a release occurred during this time period and escaped the building, it most likely would have been contained inside the asphalt curb. Therefore, past threat of release to the surface water, groundwater, air, or soil was low. Since this unit is no longer operating, current threat of release to the above mentioned environmental media is also low.

Recommendations: Washwater samples for heavy metals were taken after closure and results were below the cleanup levels specified in the approved closure plan. Therefore, no further action is recommended at this time.

SWMU 2 Cold Storage Area

Conclusions: This area was used primarily as a staging area before wastes were transferred to SWMU 1. This unit operated from 1980 until 1988. If a release occurred during this time period and escaped the building, it most likely would have been contained inside the curbed parking lot outside. Therefore, past threat of release to the surface water, groundwater, air, or soil was low. Since this unit is no longer operating, current threat of release to the above mentioned environmental media is also low.

**TABLE 3
SWMU SUMMARY**

<u>SWMU</u>	<u>Operational Dates</u>	<u>Evidence of Release</u>	<u>Suggested Further Action</u>
1. Butler Building Storage Area	1980 to 1988	None	No further action at this time.
2. Cold Storage Area	1980 to 1988	None	No further action at this time.
3. Carpenter's Shed Storage Area	1980 to 1988	None	No further action at this time.
4. Outside Earthen Storage Area	1980 to 1988	None	No further action at this time.
5. Wastewater Treatment Unit	1984 to present	None	No further action at this time.
6. Plating Cake Dumpster	1987 to present	None	No further action at this time
7. Waste Storage Area	1987 to present	None	No further action at this time.
8. Battery Storage Area	1970 to 1987	None	Conduct soil sampling for presence of corrosive or lead contamination.
9. Paint Waste Storage Area	Unknown to 1984	None	Conduct soil sampling for presence of painting waste contamination.
10. Satellite Accumulation Areas	1980 to present	None	No further action at this time.

Recommendations: Washwater samples for heavy metals were taken after closure and results were below the cleanup levels specified in the approved closure plan. Therefore, no further action is recommended at this time.

SWMU 3 Carpenter's Shed Storage Area

Conclusions: This area was used primarily as a staging area for SWMU 1. It is located inside a building with a sound concrete floor. This unit operated from 1980 until 1988. If a release occurred during this time period and escaped the building, it would have been contained inside the curbed parking lot outside. Therefore, past threat of release to the surface water, groundwater, air, or soil was low. Since this unit is no longer operating, current threat of release to the above-mentioned environmental media is also low.

Recommendations: Washwater samples for heavy metals were taken after closure and results were below the cleanup levels specified in the approved closure plan. Therefore, no further action is recommended at this time.

SWMU 4 Outside Earthen Storage Area

Conclusions: This 10-foot x 30-foot unit is located outside and was used to store 3 55-gallon drums of plating sludge. The drums were placed directly on the ground, a sand gravel mixture, before transfer to SWMU 1. During closure, 20 cubic yards of soil was removed from the unit and subsequent soil sampling revealed no contamination. Therefore, past threat of release to the surface water, groundwater, air, or soil was low. Since this unit is no longer operating, current threat of release to the above-mentioned environmental media is also low.

Recommendations: Soil samples for heavy metals were taken after closure and results were below the cleanup levels specified in the approved closure plan. Therefore, no further action is recommended at this time.

SWMU 5 Wastewater Treatment Unit

Conclusions: This entire unit is inside a building and is of sound construction. Any release from the tanks would be contained inside the building. Potential release to surface water, ground water, soil, or air is low.

Recommendations: *No further action is recommended at this time.*

SWMU 6 Plating Cake Dumpster

Conclusions: This unit is located outside, on the edge of the property, next to the Rock River. A plastic tarp covers the top of the unit, preventing rain water from entering it and wind from blowing the cake into the river. This unit poses a low threat for release to the surface water, ground water, soil, or air.

Recommendations: *No further action is recommended at this time.*

SWMU 7 Waste Storage Area

Conclusions: Spent TCA, cyanide salts, and quench oil are stored inside this unit. The concrete floor is sound and any release would be contained inside the building. No floor drains were observed in the area. Potential release to surface water, ground water, soil, or air is low.

Recommendations: *No further action is recommended at this time.*

SWMU 8 Battery Storage Area

Conclusions The batteries were stored directly on top of the soil for over a period of about 17 years. It is not known if lead or acid from the batteries leached into the soil. There was no secondary containment to control a release, so past release potential to soil was high. The terrain in the area slopes towards the Rock River, located immediately east of the facility. Therefore, past release potential to surface water via runoff was moderate. Ground water is located in a shallow sandstone aquifer at a depth of 100 feet. Past release potential to ground water

was also moderate. Because the unit is no longer operating, current release potential to soil or surface water is low. Past and current potential for a release to air was and is low. If the soil is contaminated, then the current potential for an ongoing release to ground water is moderate. If the soil is not contaminated, then the current release potential to ground water is low.

Recommendations: The soil should be tested for possible lead and corrosive contamination. If the results are positive, then the extent of soil contamination should be defined and, if warranted, ground water should also be sampled.

SWMU 9 Paint Waste Storage Area

Conclusion: Little information was available on this unit. Facility representatives stated that Barber-Colman conducted painting operations up until 1984, when they were purchased by Reed-Chatwood. The wastes were stored in containers of unknown integrity and quantity, on asphalt, 500 feet west of the Rock River. Past release potential to the surface water, ground water, soil, or air was probably low. Because the unit is no longer operating, current release potential to soil, air, or surface water is low. If the soil is contaminated, then current potential for an ongoing release to ground water is moderate. If the soil is not contaminated then the current potential for a release to ground water is low.

Recommendations: Because the integrity of the containers and asphalt is unknown, it is possible that a release could have entered the soil through cracks and patches currently visible in the asphalt. Soil sampling should be conducted to determine the presence of contaminants.

SWMU 10 Satellite Accumulation Areas

Conclusions: Waste quantities are minimal and the drums have lids and are stored inside on concrete flooring. Potential release to the surface water, ground water, soil, or air is low.

Recommendations: No further action is recommended at this time.

**ENFORCEMENT
CONFIDENTIAL**

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- Barber-Colman, 1980a. Notification of Hazardous Waste Activity, August 13.
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- Barber-Colman, 1987b. Re-submittal of Part A Permit application, January 7.
- Berg, R.C., J.P. Kempton, and A.N. Stecyk, 1984. "Geology for Planning in Boone and Winnebago Counties", Illinois State Geological Survey Circular 531, Urbana, Illinois.
- Federal Emergency Management Agency (FEMA), 1982. National Flood Insurance Program, City of Rockford, Illinois, Winnebago County. Community - panel number 170723 0016 B. Map revised June 18.
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- Illinois Environmental Protection Agency (IEPA), 1983. *Inspection Report*, January 5.
- IEPA, 1985. *Inspection Report*, May 22.
- IEPA, 1986. *Inspection Report*, November 11.
- IEPA, 1988a. *Inspection Report*, January 29.
- IEPA, 1988b. Correspondence to Rod Johnson, Barber-Colman From Lawrence Eastep, IEPA, May 5.
- IEPA, 1991. *Operating Permit*, June 4.
- Ruffner, A. and E. Bair, 1985. Weather of U.S. Cities, Vol. 1 Gale Research Co., Detroit, Michigan.
- Ruffner, A., 1985. Climates of the States, Vol. 1, Gale Research Co., Detroit, Michigan.
- United States Geological Survey (USGS), 1977. Rockford South Quadrangle, 7.5 minute topographic series.

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE IL 02 SITE NUMBER ILD 005 145 958

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)
Barber-Colman Company, Colman Metal Finishing

02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER
1300 Rock Street

03 CITY
Rockford

04 STATE
IL

05 ZIP CODE
61101

06 COUNTY
Winnebago

07 COUNTY CODE

08 LONG DIST

09 COORDINATES: LATITUDE

LONGITUDE

42 15 32.N

89 05 53.W

10 DIRECTIONS TO SITE (Starting from nearest public road)

State Highway 2 south to Montague Street, east to Rock Street, south to the facility.

III. RESPONSIBLE PARTIES

01 OWNER (If known)

Reel-Chatwood, Inc.

02 STREET (Business, mailing, residential)

P.O. Box 1200

03 CITY

Rockford

04 STATE

IL

05 ZIP CODE

61105-1200

06 TELEPHONE NUMBER

(815) 968-6833

07 OPERATOR (If known and different from owner)

Barber-Colman, Colman Metal Finishing

08 STREET (Business, mailing, residential)

1300 Rock Street

09 CITY

Rockford

10 STATE

IL

11 ZIP CODE

61101

12 TELEPHONE NUMBER

(815) 968-0860

13 TYPE OF OWNERSHIP (Check one)

☒ A. PRIVATE

☐ B. FEDERAL:

(Agency name)

☐ C. STATE

☐ D. COUNTY

☐ E. MUNICIPAL

☐ F. OTHER

(Specify)

☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

☒ A. RCRA 3010 DATE RECEIVED: 08 / 14 / 80
MONTH DAY YEAR

☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: / /
MONTH DAY YEAR

☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

BY (Check all that apply)

☒ YES DATE 04 / 23 / 91

☐ NO

☐ A. EPA

☐ B. EPA CONTRACTOR

☐ C. STATE

☐ D. OTHER CONTRACTOR

☐ E. LOCAL HEALTH OFFICIAL

☐ F. OTHER:

(Specify)

CONTRACTOR NAME(S): Resource Applications, Inc.

02 SITE STATUS (Check one)

☒ A. ACTIVE

☐ B. INACTIVE

☐ C. UNKNOWN

03 YEARS OF OPERATION

1905
BEGINNING YEAR

Present
ENDING YEAR

☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Cyanide, nickel, copper, aluminum, hydrochloric acid, caustics, zinc chloride, and quench oil.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

The facility is located in a light industrial area of Rockford. Any release from the SWMUs located inside would be contained inside the building. The plating cake stored outside is inert and poses little threat of release.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)

☒ A. HIGH

☐ B. MEDIUM

☐ C. LOW

☐ D. NONE

(Inspection required promptly)

(Inspection required)

(Inspect on time-available basis)

(No further action needed; complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT

Kevin Pierard

02 OF (Agency/Organization)

U.S. EPA

03 TELEPHONE NUMBER

312) 886-4448

04 PERSON RESPONSIBLE FOR ASSESSMENT

Jeff Indeck

05 AGENCY

06 ORGANIZATION

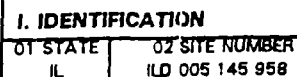
Resource Applications, Inc.

07 TELEPHONE NUMBER

(312) 332-2230

08 DATE

04 / 23 / 91
MONTH DAY YEAR



☐ A. TOXIC
☐ B. CORROSIVE
☐ C. RADIOACTIVE
☐ D. PERSISTENT
☐ E. SOLUBLE
☐ F. INFECTIOUS
☐ G. FLAMMABLE
☐ H. IGNITABLE
☐ I. HIGHLY VOLATILE
☐ J. EXPLOSIVE
☐ K. REACTIVE
☐ L. INCOMPATIBLE
☐ M. NOT APPLICABLE



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND
INCIDENTS

I. IDENTIFICATION	
01 STATE IL	02 SITE NUMBER ILJ 005 145 958

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☐ A. GROUNDWATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

Low potential for release to ground water. Operations are inside a building.

01 ☐ B. SURFACE WATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

Low potential for surface water contamination. Waste stored in Plating Cake Dumpster next to the Rock River is inert and poses a low threat to enter the river.

01 ☐ C. CONTAMINATION OF AIR 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

Low potential for contamination of air. Operations are inside a building.

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

None identified. The facility does not use explosive material.

01 ☐ E. DIRECT CONTACT 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

Low potential for direct contact. Operations are located inside a building.

01 ☐ F. CONTAMINATION OF SOIL 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED

03 AREA POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

(Acres)

Low potential for soil contamination. Operations are located inside a building.

01 ☐ G. DRINKING WATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

Low potential for drinking water contamination. Operations are located inside a building.

01 ☐ H. WORKER EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED

03 WORKERS POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

Employees work near toxic, caustic, and acidic substances. There is a potential for employee contact with these substances.

01 ☐ I. POPULATION EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

Low potential for population exposure. Operations are located inside a building.



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND
INCIDENTS

I. IDENTIFICATION

01 STATE IL	02 SITE NUMBER ILD 005 145 958
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II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ K. DAMAGE TO FAUNA

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION (Include name(s) of species)

None identified.

01 ☐ L. CONTAMINATION OF FOOD CHAIN

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ N. DAMAGE TO OFF-SITE PROPERTY

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPS ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

None identified.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

None identified.

III. TOTAL POPULATION POTENTIALLY AFFECTED: _____

IV. COMMENTS

The SWMUs at this facility pose a low potential for release.

V. SOURCES OF INFORMATION (Cite specific references; e.g., state files, sample analysis, reports)

Barber-Colman, 1980b. Part A Permit application, November 17.

ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Barber-Colman Company
Rockford, IL
ILD 005 145 958

Date: April 23, 1991

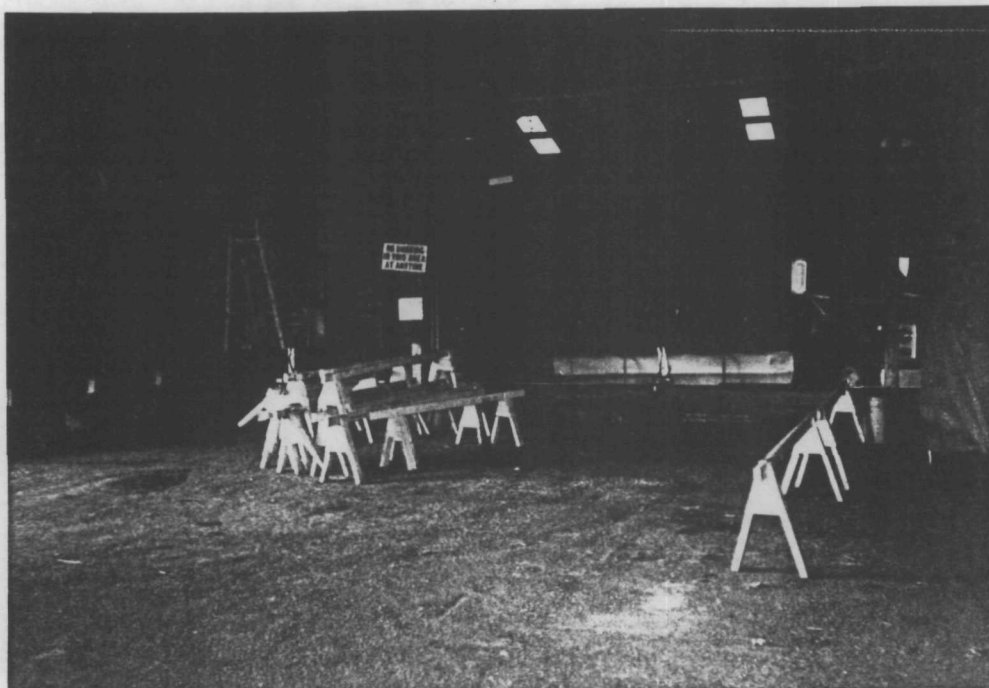
Facility Representatives : Kirit Patel, Barber-Colman
Laurens Petersen, Barber-Colman

Inspection Team: Jeff Indeck, Resource Applications, Inc.
Cynthia Tarka, Resource Applications, Inc.

Photographer: Cynthia Tarka

Weather Conditions: Raining, Temperature 50°F.

Summary of Activities: RAI conducted a VSI at the Barber-Colman facility at 9:15 A.M. on April 23, 1991. Kirit Patel and Laurens Peterson explained the facility's operating procedures and waste management practices. The tarp covering the Plating Cake Dumpster was not in place. Some cyanide salts were observed on the floor around the satellite drum. The VSI concluded at 2:45 P.M.



Photograph No. 1

Orientation: Southwest

Description: This storage area in the Butler Building was closed in 1988.

Location: SWMU 1

Date: 04/23/91



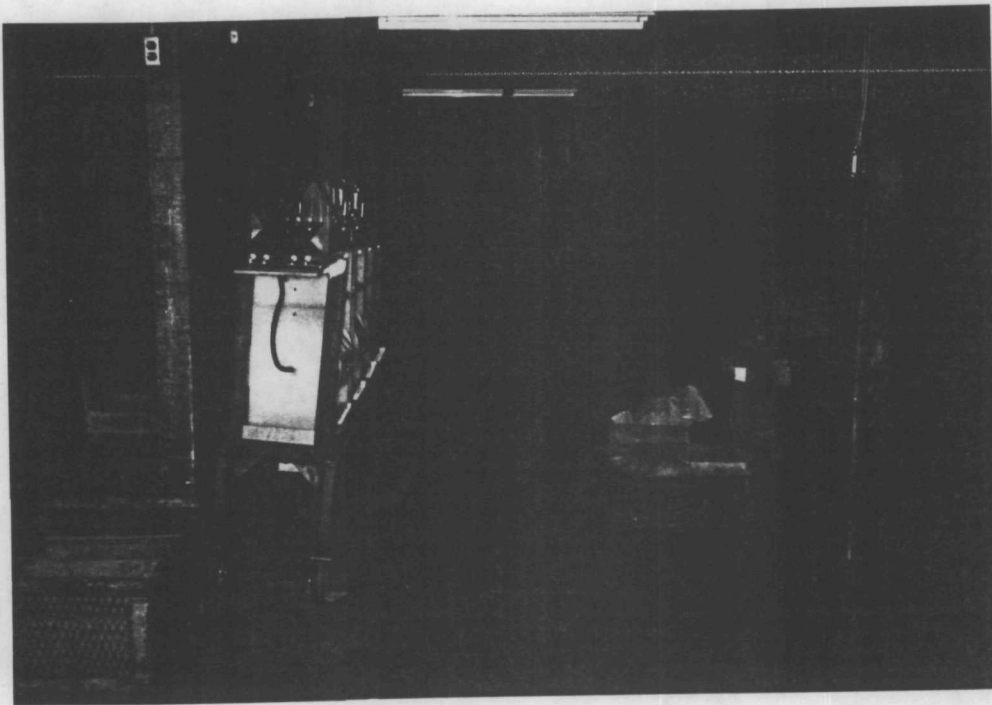
Photograph No. 2

Orientation: West

Description: This is the former Cold Storage Area. After closure in 1988, it was converted to an office.

Location: SWMU 2

Date: 04/23/91



Photograph No. 3

Orientation: North

Description: This is the Carpenter's Shed Storage Area. It was also closed in 1988.

Location: SWMU 3

Date: 04/23/91



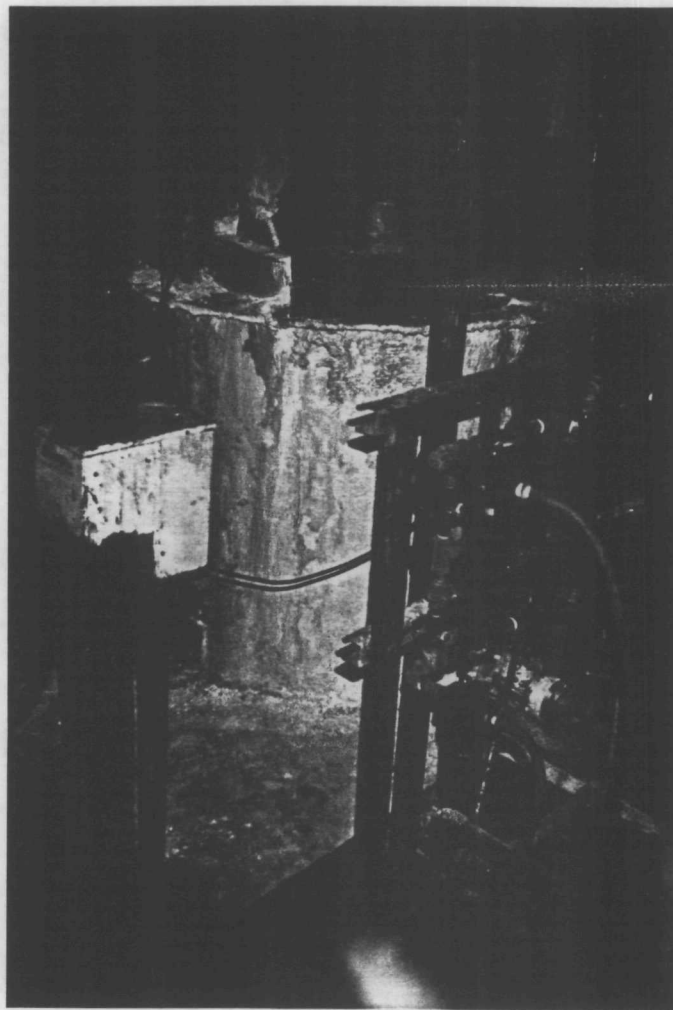
Photograph No. 4

Orientation: Northwest

Description: This is the Outside Earthen Storage Area. It was also closed in 1988.

Location: SWMU 4

Date: 04/23/91



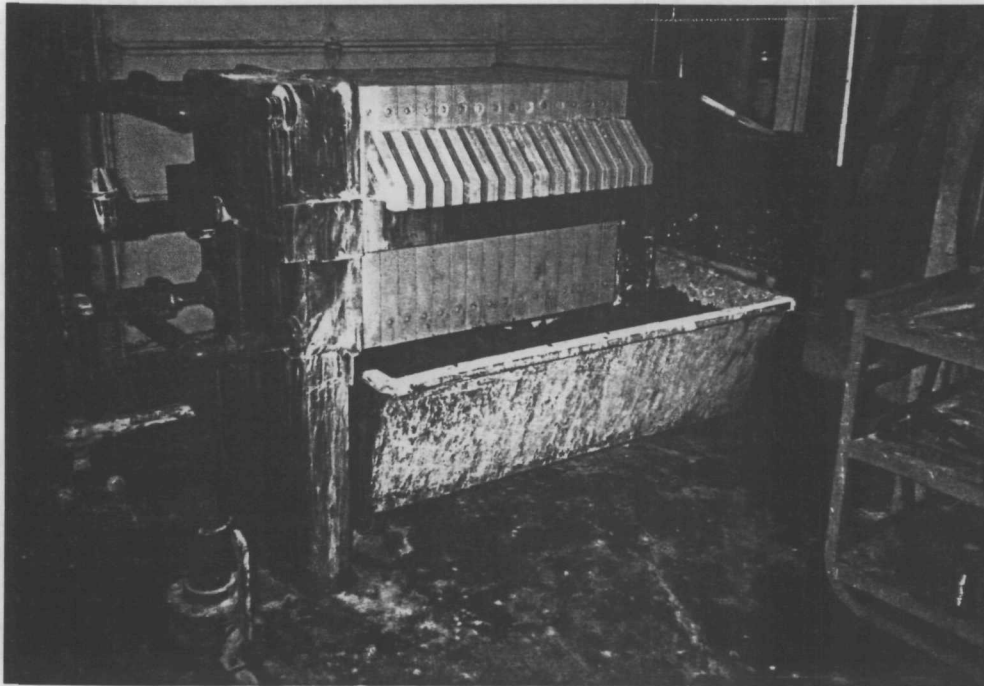
Photograph No. 5

Orientation: West

Description: This the pH adjustment tank in the Wastewater Treatment Unit.

Location: SWMU 5

Date: 04/23/91



Photograph No. 6

Orientation: Northwest

Description: This is the Filter Press associated with the Wastewater Treatment Unit.

Location: SWMU 5

Date: 04/23/91



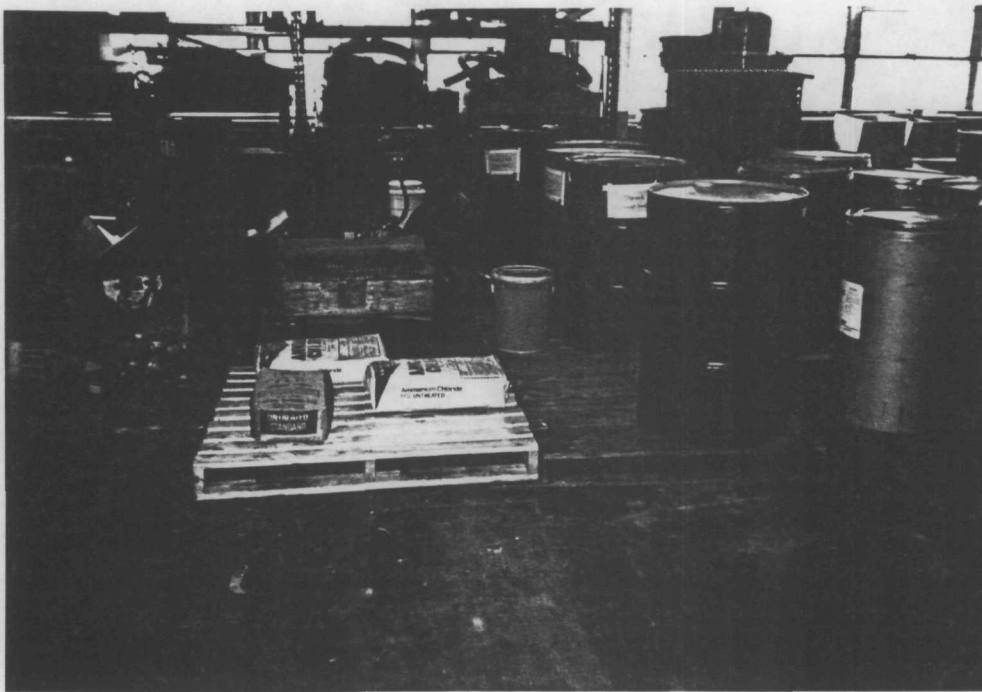
Photograph No. 7

Orientation: Northeast

Description: This is the Plating Cake Dumpster that stores plating cake generated from SWMU 5. The top of the unit was not covered during the VSI.

Location: SWMU 6

Date: 04/23/91



Photograph No. 8

Orientation: Northwest

Location: SWMU 7

Date: 04/23/91

Description: This is the Waste Storage Area. No hazardous wastes were stored here during the VSI.



Photograph No. 9

Orientation: East

Location: SWMU 8

Date: 04/23/91

Description: This is the Battery Storage Area. It has not been used since 1987.



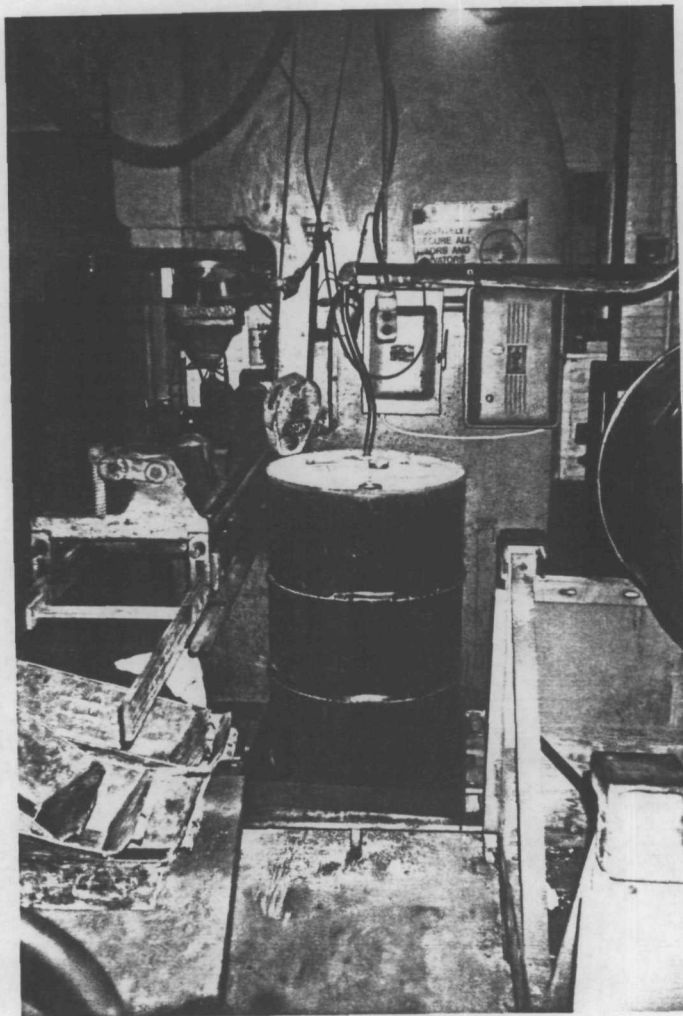
Photograph No. 10

Orientation: Northwest

Description: This area was used to store painting wastes. It has not been used since 1984.

Location: SWMU 9

Date: 04/23/91



Photograph No. 11

Orientation: West

Description: This is a 55-gallon drum used to collect spent TCA. Note the drip pan below the drum.

Location: SWMU 10

Date: 04/23/91



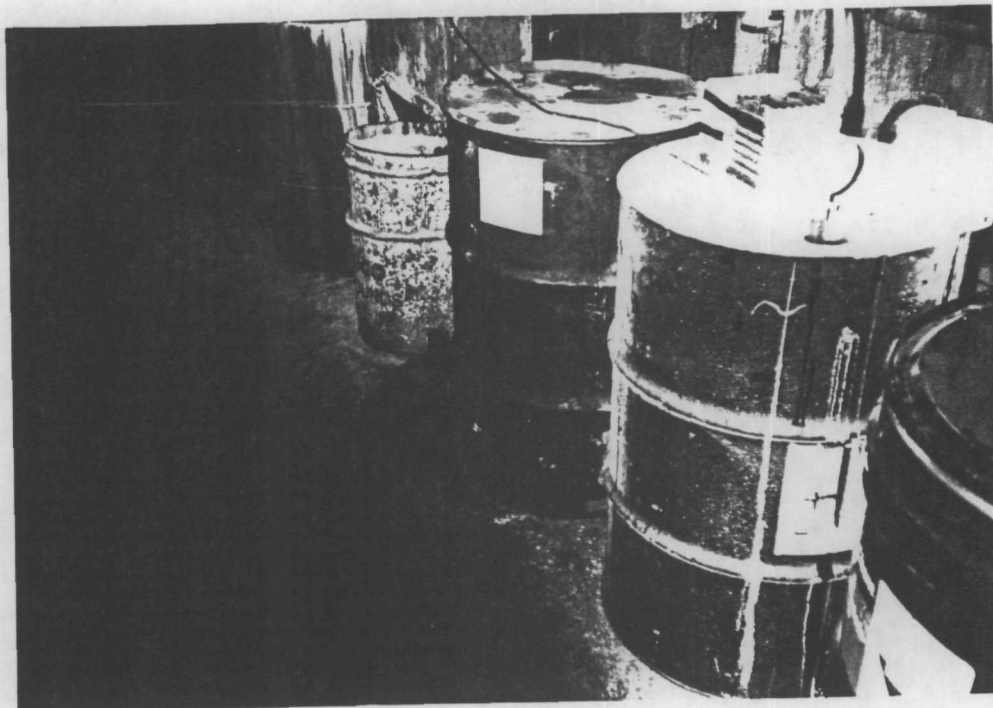
Photograph No. 12

Orientation: Northeast

Description: This is a 5-gallon bucket used to collect spent quench oil.

Location: SWMU 10

Date: 04/23/91



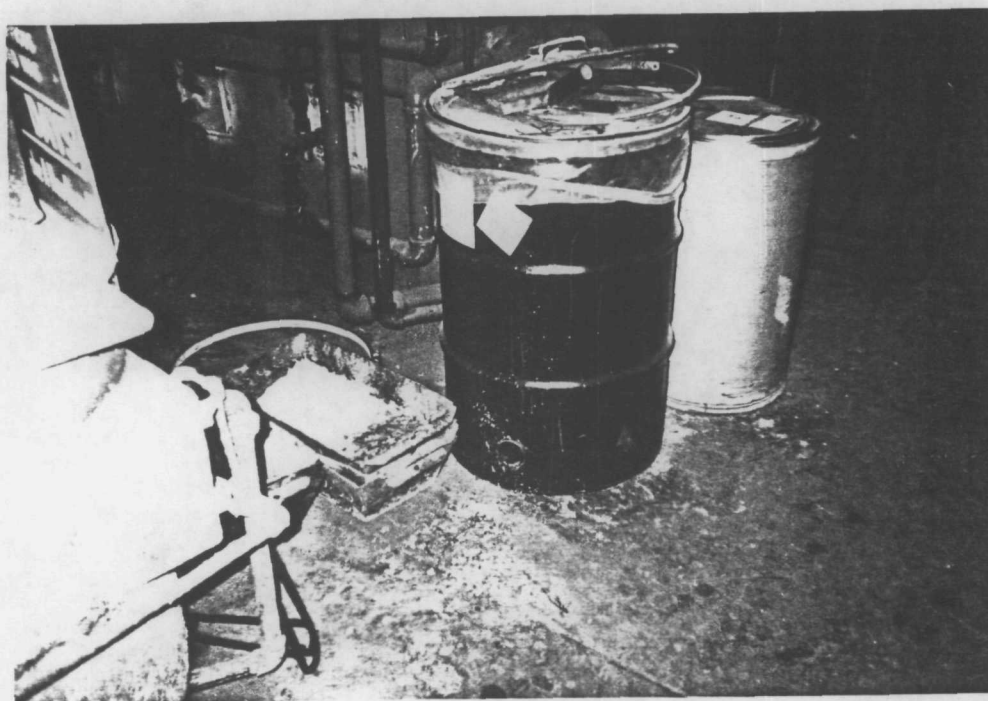
Photograph No. 13

Orientation: Southwest

Location: SWMU 10

Date: 04/23/91

Description: The 55-gallon drum marked "Hazardous Waste" contains non-hazardous quench oil. Wastes from the 5-gallon bucket (photo 12) are transferred into this drum.



Photograph No. 14

Orientation: Southeast

Location: SWMU 10

Date: 04/23/91

Description: This drum contains spent cyanide salts. Note cyanide salts on the floor.

ATTACHMENT C
VISUAL SITE INSPECTION FIELD NOTES

4/23/91 9:15 AM

3

Arrived at Barber-Colman (B-C)
@ 9:15 a.m. on April 23, 1991

The site is in Rockford Illinois
The whole property is owned by
Read Chatewood, textile manufacturer
(manufacturing yarn machines)

We (Jeff Andick & myself - Candy
Tarka) met w/ 5 employees of
B-C's division "Colman Metal
Finishing" (CMF) in the Read
Chatewood (RC) lobby & meeting room.

MEETING
B-C CMF Kim Patel Supervisor QA
and Laurens "Pete" Petersen Manager.

Meeting:

9:25am Jeff explained why we
were there & reviewed some site
history and SWML information.
BCCMF explained that they are a
separate LEGAL entity from RC.
Their relationship stems from the
fact that B-C use to own the
whole facility & property - but
sold the property facilities & the

CT 4/23/91 9/41

2

(textile division)
assets of the textile machinery & manufacturing to RC in 1984. B.C. now leases space from RC.

Jeff asked about the 3 SUMMs that are now in areas owned by RC and NOT being leased by B.C. Mr. Peterson said we could get access to these areas too, to look around & photograph.

PER explained (using the map we brought) that the SUMM area in the Barber bldg was also used by RC & a company called "Image Technology" which makes circuit boards. All 3 cos used that area for storage prior to closure. They divided it up into 3 areas.

The area is now a parking area. PER reiterated that the only business relationship between B.C.M.F. & RC is limited to: B.C. supplying pick up & heat treating services to RC; RC supplying utilities, steel cutting, & some electrical repair services to B.C.

CT 4/23/91

3

B.C. does 3 processes: (1) rotor finishing (de-burring & blasting);

(2) heat treating

(3) electroplating

* The bulk of the SOLID HAZARDOUS WASTE comes from the electroplating processes. Jeff explained that the EPA is interested in the areas where any waste is managed (SUMMs).

(2) Phosphate areas - where product is stored (because of waste potentials)

(3) Areas of Concern where either raw waste or product could be chemically from the process could be released

B.C. reviewed a list of chems used in the process (from the closure plan) & marked which chems are or are no longer being used.

B.C. said: HCl, SO₂ & H₂SO₄ might be used & disposed of - but not any longer.

Hydrofluoric acid is still used. The list still applies to the current processes, but

is HCl: most of the chemicals in B.C. is HCl

B.C.M.F. does have 2 air permits

(1) for painting

(2) for heat treatment

CT 4/23/91

4

BC just recently sent the air permits to IEPA for renewal.

B-C no longer needs to file NPDES because it owns the facility

B-C Corp is a division of B-C. Permits are filed under B-C's name. The main plant is in Loves Park (Rockford).

RE THE MAPS:

Heat Treatment - (A)

product & chem storage - Sect 17

Sulfur kept in - (B)

2 tanks HCL

Sect 5 has office & a lab on the 3rd fl

PROCESSES:

I De-burring - stones, wheel, metal products go in - vibration machine
The stones polish the edges of the metal

cut - rounded smoothed metal product comes out. The effluent is regulated by the local sanitary district & it meets the 1 ppm +

goes down the drain. Sampling system & machine B-C splits sample to test for Pb of effluent

at 4/23/91

5

Heat Treatment:

3 heat treatments

requires air permit

Endothermic - heating elements - to control the carbon content - the metal products are heat treated

product gas (D)

burned off (no out put gas w/ it)

2) Archduyung Pots

50% cyanide salts & carbonate (D)

most metal goes into labeled drum (out)

either CARBONATING or CYANIDE POTS

3) Induction Heating

Small parts heated w/ coil & quenched w/ oil (quenching oil)

Quenching oil is recycled by outside firm

4) Vapor Degreaser

uses TCA to degrease parts. It does have a cooling component.

When waste drums are filled they are moved to a secondary area & manifested w/in 90 days

Annually - 3 barrels worth (not all are full - so 4 barrels manifested / year)

at 4/23/91

6

Pb falls - generates a solid waste?
by selective hardening
It's NOT removed because
? Carbon? put on top
to keep it in?

III Electroplating

REQUIRES

AIR PERMIT

Different tanks for
different types of plating
(doesn't pump into other
tanks)

clean tanks?

Only when i.e. HCL goes bad, may
need to transfer it to another tank
for treatment (pump it out) & then
pump tank & pump it back

The only happened one time in '91
w/ rap plating line (upper plating line)

The only happen once every 1-2 yrs.

i.e. ZnCl₂ was changed 4-5 yrs ago

'91 change both cost \$1500

Waste samples

are analyzed outside before sent to Bi.

TSD also does analysis

TRANSPORTERS

use the same 3-4 haulers

i.e. hydroxide for organic
CET hauler non chgo

hazardous?

Did get an extension once when TSD had a fire

not still
transferred
w/ 1/2 bags

7

BC MP has a Lab on site But
B.C. says the Lab does NOT
generate any waste LAB does NOT
do any R&D.

TOLD SPILLS

• old product storage tanks

- had HCL & another of HCL. PVC
pipe was broken by kids throwing
stones - spill occurred & was
cleaned up. New tanks built.
Tanks are lined & covered w/ double
containment piping

• yellow chromium spill -

Neither Pete nor Kerit were
present w/ this spill on 5/23/85
It could have been inside the
plating area

• Battery Storage Area - near
garage? uncertain if it was RC's responsibility
They think it was B.C.'s responsibility

• closure: 4 AREAS were closed in '88
3 paved areas } only 2 were really
1 seal area } used

• Storage area - outside Sect. 17 - never used

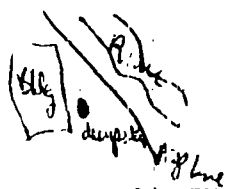
• Major storage was in Sect. 22 next plating?
where there is now a roof and enclosure
between Section 14 & 15

CD 4/25/91

8

< 90 day storage in Sect. 17

- Most waste is stored in 55-G drums.
- Other waste is plating sludge 20 m^3 stored near property line next to river



it is filter cake (little hopper waste dumped into big hopper outside by forklift)

KERSOLD, used to have 1-2 tanks? u/said?

MARVIN Clark BC 817-0241

WAYNE GARTMAN RC may be available today

- volume contaminated tank?

Whether for the KIRIT upre former of the

speculated: it was parent constituent of RC's or old carbonating heat treatment

PRE-TREATMENT OF WASTE WATER

for the sanitary district

precipitate + neutralize metal hydroxides into filter cake plating sludge residue TRANSPORTER: ensure for more treatment

PRE-TREATMENT OF: plating waters
Batch treatment waters
Pickling acids

4/23/91

9

To neutralize at a change pH

neutralize + precipitate boths ??? How are wastes removed??

NaOH
CaOH (lime) for BATH changes

waste treatment changes hexavalents to trivalent using Na_2S_2 reducing agent (sodium bisulfite)

- We looked at copies of the AIR PERMITS

- They do not have an IMPACT ASSESSMENT on releases to the environment

• They have minimized their CYANIDE PLATING BATHS because of their proximity to the river

• Although the plating lines are well contained, they have a greater potential for release than the heat treatment process

• They are self-contained under the

There has been no flooding since 1920's

They think the floodplain map for had hasn't been updated to show new dams + fact that probably no flooding in 100 years

B-C opened here @ 1905

4/24/91

10

Bldgs demolished were built in 1930-1940's
 Sect #s on the bldgs are by
 chronological age 1 - - by

MANIFEST RENEW

Date?	Vol
1/91 F006 hay solid 20/2	
D001 110450 by wst combust 556	
2/91 90LS20 maples combust 556	
" " 908790 TCA combust 1106	
4/91 F006 hay solid 20/2	
2/91 F002 TCA 3306	
D003 cyanide dig 556	
F007 Cyanide soln 4956	
4/91 F006 hay solid 20/2	

skulders include:

Treatment One

Environ

Aviation Industries

whole area on map - shows

it is fenced

Under gates @ some Bldgs

at 4/23/91

4/23

VSI

C 11 20

Light conditions

Overcast
 rain
 occasional
 sun

Began on 3rd floor of Bldg Sect 5
 LABS where they said NO hay waste
 area of debris absorption

Picture Number

- ① LAB
 1st Process area for testing
 5 Chemical product storage area
 for testing

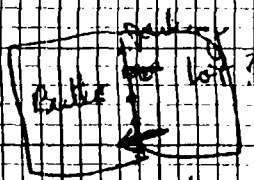
Red Containers labelled TCA
 they pour TCA from glass bottle
 into red containers kept under
 small table

ACC

- ② Bath (sun)
 Butler Bldg 2nd to 10th

3 Bldgs were part of the summer but
 B-C only used 1/2 bath - other
 1/2 bath used by me + Margaret
 BC stored: TCA?, V filter, chrome
 acid, SO₄, trench waste oil

For closure this area was washed
 scrubbed + treated clean
 samples analyzed by culture group



at 4/23/91

12

This area is owned by Red Chalkwood.
The closure only involved the 1 1/2
bags of C. used

The other 1 1/2 bags were (apparently)
not part of the closure
cause of water conflict but of C. closed
it by they felt unreasonable
Red Chalkwood stored paint sludge &
degreasers there

Image Tech stored Sol, Cu in small
quantities.

Area now is empty except for a
Bent stored in the bags used by
RC & Image Tech

4, 5, 10 near SW (west) door
Picture of raw chemical product
stored in Sect 17 (3w out of 14)

7

Same area - across from
mass storage. This is where
some big barrels of raw product
had pumps on them to take out
chemicals. Picture shows the
barrel which is pumped into
smaller containers & used
elsewhere

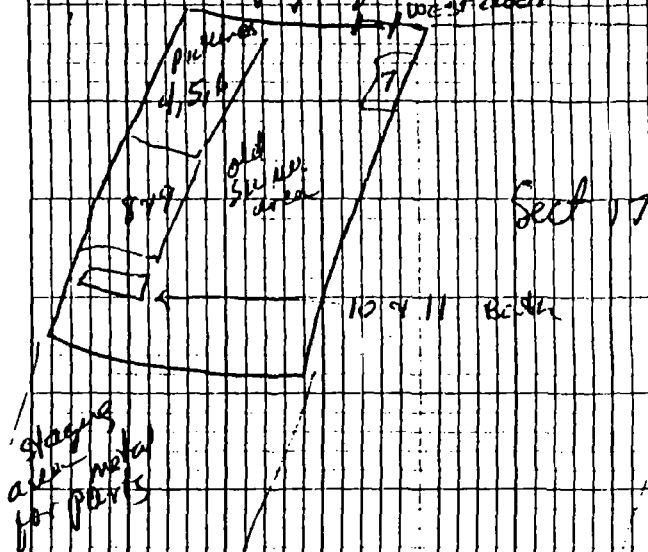
or 4/23/11

13

8, 9

Also in Section 17 next to
product storage

Waste storage area where
waste kept before it is
manifested. (Quenchback is
non-hazardous & is recycled
by a company) Area was
empty of hazardous waste
containers



10, 11

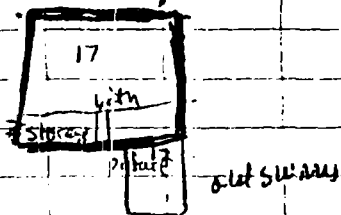
Temp. Plating Bath
staging area for metal
parts, also has the temporary
plating bath

Plating Bath @ 400 g had nickel
residue (green) inside. It was on
a wood platform

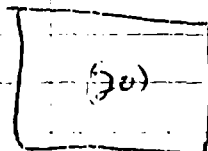
or 4/23/11

14

- 12 Storage area on SE outside of Sect 17 - B-C said they never used this area. Area is @ 20 x 30 ft



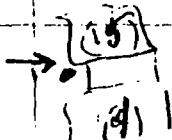
- 13 Old Battery and Tank area
It is now a parking lot. There is a pump nearby
South side outside of Sect 20



batt. 13 old swam
area

Old dock area is in parking lot

- 14 Show a picture of another portable bathing bath outside (15) of area in between Sect 14 + 15
This bath has a cover



or 4/23/41 -

15

- 15 Old Summ area (well) part of old En between Sect 14 + 15
This area was surrounded by a large roofed & is now enclosed connecting 842 & 843. Upon entry from the door there is an office where the old Summ storage area was 14 x 14' from door to back wall of office



This area was used to store Mi filler, French sledges, 300 lbs, staging area - used heavily years ago. No 104 was kept here. The office was here for 1 1/2 yrs

- 16 + 17 2 Bays in Sect 14 (batter office) on N side of Sect 15
used to store Mi fillers etc
1st Bay used by B-C
2nd Bay used by R-C
It isn't used much now, but plan on leasing this space soon

or 4/23/41

14 16

N side of Set 18?

18, 19

Nickel Plating tanks in Set 18
Shows spill containment trench
w/ metal grades
Also shows green Ni spill on
floor. (There are dragout lines)

20

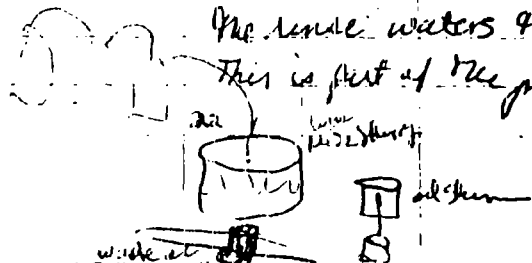
Across (end) of Ni paths are
the Black Oxide tanks
Picture shows platform up to
area w/ containment that runs
into containment trench in whole
area

21

Barrel (bucket) of chromic acid
& water mix - when bath
is too full - they put some
in these containers until it
is needed for the bath.
This is an AOC

22

Notice of the lime & Na_2S_2 slurry
mix in a vat. This is pumped into
the rinse waters to neutralize them
This is part of the pre-treatment



04/23/91

23

Oil skimmer next to the
lime slurry vat. There is a bucket
under it collecting waste oil

24

Oil waste is in a 55-gal barrel
marked Hazard Waste. When it
is full it is removed for
disposal. This barrel is directly
across from the oil skimmer
in the pretreatment area

25

NaOH and SO_2 & polymers added
to neutralize pH & stabilize waste
which are removed from pretreatment
waters. The resulting filter cake
is attracted into a small hopper

25

At end of pretreatment line
near SE door of Set 19
(by River) filter cake (waste)
is put into a small
hopper

It is non reactive & contains
Chromium + Nickel

26

Big hopper directly outside
S of Bldg 19. It is at edge
of property next to fence,
along the Rock River. It was
handling in the hopper was

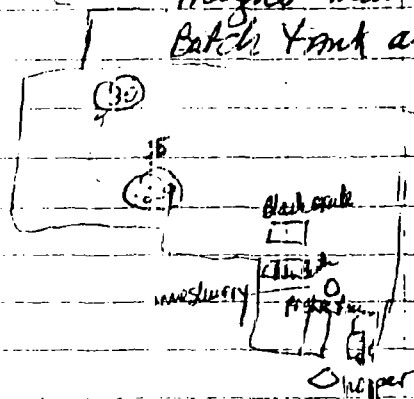
04/23/91

18

removed when we took the
picture. Filter cake is sent
to Enviro for treatment &
disposal

27

Zn bath shows containment tank
(along side of the ^{pre-treatment area} ~~back of the tank~~)
occasionally B-C cleans the
tanks that go to through the
Batch Tank area



28

zn lines up new water

14-15

29

rotifinisher is across from the
Zn Baths in
shows vibrator & steam condenser

OT 4/23/1

19

30

Cham plate sealing uses Aram
soln - with chemically hard
Cr soln to seal metal parts (near
R&H finishing)

31

HCl tanks outside on embankment
in between Sect 15? & Sect 13
These tanks hold HCl product
in most resistant double
contained tanks. Has lines
for pumping in & out. Tanks are high
density polypropylene.

32

Sect 16 Air furnace will
quench metal of oil after its
heat treated. Quench oil
is recirculated - B-C scrap its
Non-hazardous This is a subtle
process.



33

Cyanide & Pb pit area
Picture of label used for dfg
out waste cyanide put into
waste barrel - white is dried cyanide

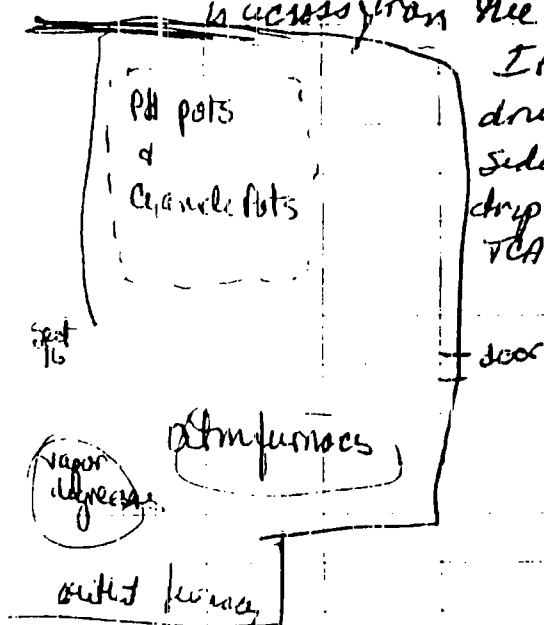
OT 4/24/1

- 34 Shows how wst cyanide drum
& spill (white dried cyanide
powder) - ~~to~~ barrel will
be taken to Sect 17 for
removal when its full.

35

Vapor degreaser TCA for degreasing
is across from the atm furnace.

It is a 55-G
drum on its
side w/ pump (+
drip bucket) pump
TCA into degreaser



- 36-37 Waste TCA + oil comes out
into unmarked TCA barrel
There is a drip pan under
barrel w/ drips in it. It
is poured w/ funnel back into
drum when its removed for
disposal. 10/2/91

38

Old tank area HCL & H₂O tank
area outside on E side of
Sect 19 + 15 where tracks are
By property line. This is where
kids threw stones & broke the
pipe leading to fuel tanks &
causing a spill. Picture shows
where an wall where acid
dripped from the pipe.

Area roll of film
Picture Number

1, 2

Outside S of Sect 12 where
paint waste was storage. It
is almost empty paved area
of wood slat refuse on it. Apparently
it was not used since late
80s or early 90s. There were 255 ft
was not part of the closure.
Nothing has been stored there since
area is not leased by BC.

3, 4, 5

In Sect 12 - almost in Sect 13
on North side on between
former area where underground

10/2/91

22

Storage tank was. The area
is not leased by B-C

We returned to lobby of RC
+ then left the facility around
2:45

CS 4/23/91

23

6/14/91

VST Barker Chemical Co. II
2500 S. Seneca - Chicago IL

Conditions: Sunny, hot, WTCZ
80-85°

current owner of this property is FA do
Sherwin Williams

Present: Gabriella Norkin, RAI 1- ^{OK}
Cindy Wanka, RAI 2- ^{OK}
Sheri Bianchini, RRA-EPA
Nick Madsen, Corp. Environ. Dir - ^{OK}
Rob Martin, Environ. Mgr. Corp - ^{OK}

Mr. Martin told RAI that he had been
to this property once before ~ 5 yrs. ago.

While we waited for Mr. Martin to
make a phone call, RAI + EPA met
Grant Crawley, Crawley's Truck Yard, from
the neighboring property. We asked
Mr. Crawley if he knew about the
property and Barker Chem. Co. Mr.
Crawley stated that he had leased the
property in the late 70's before Barker
bought it, and it was very clean.
He did not remember much of a
stop-gap between the time Sherwin
Williams sold it to Barker. He stated
that Barker's operation was

CS 4/4/91